



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6
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DALLAS TX 75202-2733

JUN 02 2011

Mr. Gary Jacobson
Senior Environmental Project Specialist
Chevron Environmental Management Company (CEMC)
4800 Furnace Place, E534A
Bellaire, TX 77400

Re: Star Lake Canal Superfund Site, Tier 2 RI Report

Dear Mr. Jacobson:

Enclosed are the comments from the U.S. Environmental Protection Agency (EPA) and the Texas Commission on Environmental Quality (TCEQ) on the Tier 2 Remedial Investigation (RI) Report for the Star Lake Canal Superfund Site.

EPA risk assessor's comments deal with the correction and revision for four tables, fixing electronic copies where texts cannot be read, provide hard copies of revised texts and tables, or entire revised reports. Other comments relate to 1.) Protective Concentration Level values for upper trophic level receptors; 2) method of defining areas represented by sample location and figures showing revised areas; and 3) list of Contaminants of Potential Ecological Concern in revised areas. Items #1, #2 & 3 should be in the alignment document. The TCEQ's comments on the Tier 2 RI report have much in common with the EPA risk assessor's comments. The above comments shall be incorporated in the revised documents and tables. The work incorporating EPA's and TCEQ's comments shall be completed by June 27, 2011. Please feel free to call me at (214) 665-6782 or communicate via e-mail to ghose.shawn@epa.gov for any clarification that will expedite revision of the document and produce a revised schedule.

Sincerely,

Shawn Ghose
Remedial Project Manager

Enclosures

cc: Carlos Sanchez, EPA
Kenneth Shewmake, EPA

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**EPA Comments on
Draft Tier 2 Remedial Investigation Report
Star Lake Canal Superfund Site
Jefferson County, Texas**

Table 9-3: Correct the PEL value for category 3. Ensure that correct values are listed in the legend on fig 9-2. If the revision results in a change in category ranking for any sample locations then apply changes to all associated figures, text, and tables.

Table 9-15: Enter all COPECs that exceed benchmark values and that were not shown in the table unless a valid reason for excluding the COPEC is presented. As multiple lines of evidence are being used, it is not appropriate to exclude a COPECs because it was evaluated using ERM-Q/PEL-Q analysis. Apply revisions to all associated figures, text, and tables. Update any values or analysis based on these results.

Table 9-26: In legend create an additional category called probable risk (P). Apply this value to all receptors where the HQ (GMACT) ≥ 1 and HQ (LOAEL) < 1 . Revise table and all associated text (9.5.2.4, page 175) Apply revisions to all associated figures, text, and tables. Update any values or analysis based on these results.

Table 9-24: Revise table so that all the exceedances of a midpoint benchmarks are presented and are used in the line of evidence evaluation. No COPEC is to be excluded unless the line of evidence is not applicable (example SEM/AVS only applies to 6 metals), the COPEC is screened out according the work plan, or the result is categorized as uncertain. COPECs may not be excluded because they were evaluated in the ERM-Q/PEL-Q analysis. The comparison to 2nd effects levels should not be shown as these values are not considered a line of evidence. Revise table and all associated text. Apply revisions to all associated figures, text, and tables. Update analysis based on these results.

Section 12.0, page 214-215: Change conclusion so that it states that some results are in the upper end of the cancer risk range, instead of "did not identify any potential risk from COPCs to human receptors that may utilize the site". State that the results will be discussed further in the FS. Provide a brief discussion of the cancer risk values at the site that are within the established cancer risk range. A description of the cancer risk range established in CERCLA can be provided that states that the upper end of the risk range usually applies to residential areas and sensitive populations while the lower end of the risk range typically applies to commercial-industrial uses. The conclusion should state that groundwater was not addressed in this risk assessment as it is being evaluated under the Texas Corrective Action Program.

Table 9-2, and page 146 first paragraphs: Present justification for removing total PAH from ERM-PEL analysis or revise text, table, and figs so values are calculated as it was done in the previous version of this report.

Provide an electronic copy of the document after revision along with hard copies of revised tables, figures and text.

Section 9.4.2, page 146 last paragraph to first paragraph page 147: Remove the second sentence as all COPEC detections should be compared to first effect benchmarks and the midpoint between the first and second effect benchmarks. A comparison to second effect benchmarks can be provided but the text should state this is a probable effect level and is not used for risk evaluation. The text should state the midpoint between the first and second effect benchmarks is used in the line of evidence evaluation. The text should describe the area established for the arithmetic mean and RME comparison to benchmarks.

Page 147, second paragraph: Change text to indicate that the second effect level is provided as a reference to calculate the midpoint between the first and second effects levels.

Page 162, Section 9.5.1.2.3 Soil and Table 9-20: Second effect levels should be used as an indicator of risk. The Midpoint benchmark should be used.

Page 175, section 9.5.2.4, Risk to Upper Trophic level Receptors: Change text to state that if $HQ_{(NOAEL)} > 1$ for threatened and endangered species then risk is considered high. Revise Table 9-26 and other affected tables and figures.

Page 189, Section 9.6.4, 1st paragraph: revise text to acknowledge risk to White faced ibis, Wood Stork, and Painted Turtle.